

LEONARDMEYER LLP

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Attorneys for Plaintiff/Counter-Defendant
WAYNE HIMELSEIN

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - (Western Division – Los Angeles)

WAYNE HIMELSEIN, an individual,

Plaintiff,

v.

LS1 LLC, a Pennsylvania Limited
Liability Company; and DOES 1
through 20, inclusive,

Defendants.

LS1 LLC,

Counterclaim-Plaintiff,

v.

WAYNE HIMELSEIN and LOGICA
CAPITAL ADVISERS, LLC,

Counterclaim-Defendants.

CASE NO. 2:18 –cv-03940 GW (JCx)

**DECLARATION OF DEREK J.
MEYER**

1 I, Derek Meyer, declare as follows:

2 1. I am a partner at the law firm of LeonardMeyer LLP, counsel for
3 Plaintiff/Counterclaim-Defendant Wayne Himelsein (“Himelsein”) and
4 Counterclaim-Defendant Logica Capital Advisers, LLC (“Logica”) in the above
5 captioned matter.

6 2. I have personal knowledge of the matters referenced below

7 3. I set the hearing dates for two large matters in June and July of 2019 in
8 Chicago, Illinois and San Jose, California around the March 24, 2019 trial date this
9 Court set for this matter in response to LS1’s first motion for a stay. The Chicago
10 hearing is set for June 29, 2019 through July 3, 2019. The San Jose hearing is set for
11 the weeks of July 13, 2019 and July 20, 2019. Having these two matters set so closely
12 for hearing will consume June and July for me. If any stay is allowed, the dates set by
13 this Court in its last scheduling order should be extended either 45-60 days or 150
14 days. A stay of 90 days as requested by Defendants is wholly unworkable. The same
15 holds true for a stay of 120 days given the hearing dates referenced above.

16 I declare under penalty of perjury under the laws of the state of California and
17 the United States that the foregoing is true and correct.

18 Executed on November 29, 2019, in Los Angeles, California.

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20 /s/ Derek J. Meyer
21 Derek J. Meyer
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